

REMARKS

1. In Paragraph 3 and 4 of the Office Action, the Examiner states that claims 1-3, 5-8, 18-20 and 22-25 are rejected under 35 U.S.C. 102(e) as being anticipated by Screen Dumps of Netscape 4.75 ("Netscape"). Applicant respectfully points out to Examiner that 35 U.S.C. 102(e) concerns only applications and patents filed by another as prior art, yet Examiner has cited no patents or published applications. Instead, Applicant has made the assumption that Examiner intended to cite 35 U.S.C. 102(a) as grounds for its rejections under Paragraphs 3 and 4 of the Office Action. If Applicant's assumption is incorrect, please advise otherwise.

2. Applicant has amended independent claims 1, 17 and 18 to further distinguish those claims from the "Bookmarks" feature of Netscape Communication 4.75 ("Netscape"). A distinction between Applicant's invention and the "Bookmarks" feature of Netscape is that users of Applicant's invention only see and work from a *copy* of a default directory. At no time does a user of Applicant's invention make changes directly to the default directory. As provided on page 8, line 12 of Applicant's specification, "The above described creation of the individualized user directory *does not alter* global directory 10 as that directory resides on a server, *but only alters the view* of global directory 10 provided to the user." When a user makes changes to the individualized user directory, those changes are stored in a "user customization data file." When the individualized user directory is accessed, the user sees a *copy* of the default directory that has been *automatically* reconfigured based upon the user customization data contained in the user customization data file. Despite the reconfiguration of the *copy* of the default directory, the *actual* default directory remains unchanged. Furthermore, the preferred changes of multiple users can be collected and analyzed. To further clarify in the claims that the default directory of Applicant's invention is not directly modifiable by a user (although the default directory may

indirectly be modified by the global usage history obtained from user customization data retrieved from multiple user customization data files) the Applicant has added the term “global” as a modifier of default directory.

In contrast to Applicant’s invention, a user of the “Bookmarks” feature of Netscape does not work from a *copy* of a default listing, but instead always works from the *actual* list of saved Internet links. The list of bookmarked links is created in Netscape by saving or “bookmarking” various websites. The list is stored on the user’s computer and is directly modifiable by the user. For example, users of Netscape’s “Bookmarks” feature make changes directly to a list of bookmarked links by adding new links, renaming links, and creating new folders to contain some of the links. However, after a user makes changes to the bookmarked list, the user’s changes are stored and updated in the *actual* saved bookmark directory, not a *copy* of the bookmarked directory.

3. In Paragraph 6 of the Office Action, Examiner rejected Applicant’s claims 4 and 21 under 35 U.S.C. 103(a) as being unpatentable over Screen Dumps of Netscape in view of Screen Dumps of Microsoft NT (“MS Win”). Applicant believes the foregoing rejections have been rendered moot in light of Applicant’s amendments to claims 4 and 21 as well as amendments to the independent claims from which claims 4 and 21 depend; however, Applicant offers the following remarks in order to be completely responsive to the Office Action. MS Win shared directory or network directory (screen dump provided by the Examiner) does not cover the methods claimed in Applicant’s claims 4 and 21. In the shared directory, a user, who has the change privilege, can only make changes to the *actual* shared directory. After a user makes any changes, the *actual* shared directory will be modified so that other users will see the results of the changes. Thus, the shared directory does not provide a *copy* of the shared directory to each user.

In contrast to MS Win, Applicant's claims 4 and 21 contemplate a user viewing an "individualized user directory" which is a *copy* of the global default directory maintained on a server computer, wherein the *copy* of the global default directory has been reconfigured based upon the user customization data stored in the user's user customization data file. The result of this distinction between Applicant's invention and MS Win is that each user of Applicant's invention has an individualized view of his/her own directory as the results of his/her own preferred changes.

4. The Examiner rejected claims 9, 17, 26 and 34 under 35 U.S.C. 103(a) as being unpatentable over Screen Dumps of Netscape in view of US Patent Number 5,799,292 to Hekmatpour ("Hekmatpour"). As a result of the amendments that have been made to the claims, and the distinctions made between Netscape and Applicant's claimed invention, Applicant believes that Examiner's rejection of claims 9, 17, 26 and 34 have been rendered moot. However, in order to be completely responsive, the Applicant respectfully submits that Hekmatpour does not disclose a "universal/global usage history" as alleged by Examiner in Paragraph 7 of the Office Action. The Examiner states in Paragraph 7 of the Office Action that "Hekmatpour teaches collecting user customization data from multiple users in order to form a *universal/global usage history* (col. 10, lines 8-39)." Applicant has reviewed col. 10, lines 8-39 of Hekmatpour, but can find no reference or suggestion of a "universal/global usage history" collected from multiple users.


In addition to Hekmatpour not disclosing a "universal/global usage history", there is absolutely no incentive nor suggestion to combine the teachings of Hekmatpour with the teachings of Netscape in order to render Applicant's invention obvious under 35 U.S.C. 103(a). The objective of Hekmatpour is to collect the usage habit of a particular user, such as the number

of object scrolls and mouse clicks performed by a user, in order to modify the screen layout of hypermedia objects within a hypermedia system. In contrast, Applicant's invention pertains to the reconfiguration of *files* within a global default directory based upon preferences obtained from a global usage history compiled from the user customization data of multiple users, not the adaptation of the screen layout of *hypermedia objects* as taught by Hekmatpour.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully Submitted:

Date: 5-12-05



Trey W. Cloud, Reg. No.: 52,755
Jones, Walker, Waechter, Poitevent, Carrère &
Denègre, L.L.P.
8555 United Plaza Blvd., 4th Floor
Baton Rouge, Louisiana 70809
Tel. No.: (225) 248-2074

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: **Mail Stop Amendments** Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on this 13th day of May, 2005.

